

23 Rhode Island Catholic?

24 A Yes.

25 Q Having seen this document, does it

00038:01 refresh your recollection --

02 A Yes.

03 Q -- of whether or not 941-9273 was your

04 number?

05 A No, it wasn't. I wasn't my number.

06 Q Okay.

07 A It was not mine. I think this was

08 Raymour's number.

09 Q Okay. Now, if you turn your

10 attention -- if you go back to the Ameritrade

11 application, Exhibit 7, if you can turn to the

12 last page of this document, it's a three-page

13 document. If you can just put down the sheet so

14 you can be seen.

15 A Oh, okay.

16 Q Do you see the section in paragraph 11

17 that says account coowner?

18 A Yes, I do.

19 Q Okay. And if you go back, just to

20 refresh your memory, you are listed as the account

21 coowner on the front page of this document.

22 Is it true that you have -- it says zero

23 dependents. You have no children, that's correct?

24 A Correct.

25 Q Okay. Now, the next line says that,

00039:01 "Funds available for options trading, \$50,000  
02 plus."

03 First of all, do you know what options  
04 trading is?

05 A No.

06 Q Did you have at the time, January 4th,  
07 2008, more than \$50,000 available?

08 A Absolutely not.

09 Q Okay. How much money did you have at  
10 the time?

11 A Twenty bucks, maybe.

12 Q Okay. Did you -- is that X in this  
13 document where it says, "More than \$50,000," did  
14 you write that X in?

15 A No. I never seen this document.

16 Q Okay. Did Raymour ask you how much in  
17 funds you had available?

18 A No.

19 Q Okay. Now, the next box over says,  
20 "Years of investment experience," and it's marked,  
21 "6 - 9."

22 At this time in January 4th of 2008, had

1           23    you had any investment experience?

2           24           A     No, not really.

3           25           Q     Did you have six to nine years of

4   00040:01   investment experience?

5           02           A     No.

6           03           Q     Now, the next box over -- well, still on

7           04    the box of investment experience, did you mark

8           05    that as -- that X next to 6 - 9?

9           06           A     No. I never seen this document.

10          07           Q     Okay. Did Raymour ask you about your

11          08    investment experience?

12          09           A     No.

13          10           Q     The next box over is investment

14          11    knowledge.

15          12                   Do you see how it's marked with an X

16          13    next to "Extensive"?

17          14           A     Wait a minute. Say this again.

18          15           Q     Let me just point this out to you, the

19          16    next box over.

20          17           A     Okay.

21          18           Q     It says here, where it says investment

22          19    knowledge --

23          20           A     Uh-huh.

24          21           Q     -- do you see how it's -- the X is next

25          22    to the box?

1           23           A     Yes, I do.

2           24           Q     Next to the word "extensive"?

3           25           A     Yes.

4     00041:01           Q     Do you consider yourself to have

5           02     extensive knowledge of investments?

6           03           A     No.

7           04           Q     Did Raymour ever ask you about your

8           05     investment knowledge?

9           06           A     No.

10          07           Q     Now, it says -- if you go over the next

11          08     box, it says, "Average transaction size, \$2,001 to

12          09     \$5,000." That box is marked off.

13          10                   Did you have any transactions whatsoever

14          11     with investments?

15          12           A     No. I never seen this document.

16          13           Q     So that -- that information that you

17          14     had, your average transaction size was between

18          15     \$2,000 and 5,000, is incorrect?

19          16           A     Yes. The only money I had was the money

20          17     that -- that Mr. Raymour gave me.

21          18           Q     Okay. Now, it says -- if you go down to

22          19     the next line, all the way to the left, it says,

23          20     "Number of transactions per year." 10 to 19 box

24          21     is marked off.

25          22                   Did you have 10 to 19 investment

1 23 transactions per year prior to signing this

2 24 document?

3 25 A No.

4 00042:01 Q All right. The next box says, "Types of

5 02 transactions. Check all that apply, stocks,

6 03 bonds, and options."

7 04 Had you had --

8 05 A None.

9 06 Q You had no --

10 07 A No.

11 08 Q -- transactions with any of those?

12 09 And again, do you know what "options"

13 10 refers to? Do you know what an option is?

14 11 A Wait a minute. Yeah, an option is you

15 12 can or you can't.

16 13 Q Okay.

17 14 A The only option I had was with Raymour.

18 15 Q Okay. Now, the next box over says,

19 16 "What are your investment objectives?" And the

20 17 boxes that are marked are "growth" and "income."

21 18 Did you ever discuss with Raymour

22 19 anything about what your investment objectives

23 20 were? Do you want me to point out where I'm

24 21 referring to?

25 22 A Yeah.

1           23           Q     It's this here.

2           24           A     Okay. No.

3           25           Q     Okay. Now, the -- the final box on the

4     00043:01   second row to the right says, "What type of

5           02     activity do you plan to conduct in your options

6           03     account?" And the box is marked, "Purchase

7           04     options."

8           05                   Do you see that?

9           06           A     Yeah.

10          07           Q     Okay. Did you plan to purchase any

11          08     options?

12          09           A     No.

13          10           Q     Do you know what that means, to purchase

14          11     an option?

15          12           A     Right. The only thing I planned was to

16          13     get \$2,000 off of Mr. Raymour.

17          14           Q     Okay. Now, we can finish with that

18          15     document. And I would like to show you Government

19          16     Exhibit No. 9.

20          17           A     Boy, when I leave here, right, I'm going

21          18     to be a lawyer myself. Okay.

22          19           Q     Exhibit 9 is entitled, "TD Ameritrade

23          20     Margins/Options Account Upgrade Form."

24          21                   Does this document look familiar to you?

25          22           A     No, never seen it.